IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

LOUISE T. COOLEY

Plaintiff,

17 C

PAUL E. RIPPEON

AND * Case No. 1991E Civil

ALL PERSONS HAVING OR

CLAIMING TO HAVE AN

INTEREST IN THE HEREIN

DESCRIBED PROPERTY

MOTION FOR SUMMARY JUDGMENT

COMES NOW the Plaintiff, Louise T. Cooley, by her attorneys David S. Weinberg, Rand D. Weinberg and Weinberg & Weinberg, and does hereby move this Honorable Court to enter Summary Judgment in her favor and against Defendant, Paul E. Rippeon, and as cause therefore states as follows:

1. In her Complaint to Quiet Title and/or To Establish Title by Adverse Possession and for Injunctive Relief, Plaintiff has sought an order from this Court granting to the Plaintiff title by adverse possession to a rectangular parcel of ground located in Frederick City, Maryland, containing approximately 450 square feet.

The said parcel of ground (hereinafter referred to as the "disputed property") is more specifically described in paragraph 1 of the aforesaid complaint, and is further

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FREDERICK, MARYLAND